

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND, LTD., on
behalf of itself and all others similarly situated,

Plaintiff,

v.

BARCLAYS BANK PLC, BARCLAYS CAPITAL
INC., COÖPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A.,
DEUTSCHE BANK AG, LLOYDS BANKING
GROUP PLC, THE ROYAL BANK OF
SCOTLAND PLC, UBS AG AND JOHN DOE
NOS. 1-50,

Defendants.

No. 15-cv-03538 (VSB)

ECF Case

DECLARATION OF MARC J. GOTTRIDGE

MARC J. GOTTRIDGE declares, pursuant to 28 U.S.C. § 1746(a)(2):

1. I am an attorney in good standing, admitted to the bar of this Court, and am a partner in the firm of Hogan Lovells US LLP, attorneys for Defendant Lloyds Banking Group plc. I submit this declaration in support of Defendants' motion to dismiss the claims in Plaintiff's Amended Complaint as against Defendants, and in particular to convey to the Court copies of certain documents referred to in the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss Plaintiff's Amended Complaint for Lack of Subject Matter Jurisdiction and Failure to State a Claim.

2. Attached as Exhibit A is a true and correct copy of a survey published by *Factiva*, dated June 19, 2008, titled *Market Participants Doubt Libor Rates Reflect Market Rates*.

3. Attached as Exhibit B is a true and correct copy of an article published by the *Financial Times*, dated April 21, 2008, titled *Doubts over Libor Widen*.

4. Attached as Exhibit C is a true and correct copy of an article published by *Bloomberg*, dated April 16, 2008, titled *Bankers Group Reviews Libor amid Manipulation Concern*.

5. Attached as Exhibit D is a true and correct copy of an article published by the *Wall Street Journal*, dated April 16, 2008, titled *Libor Fog: Bankers Cast Doubt on Key Rate amid Crisis*.

6. Attached as Exhibit E is a true and correct copy of an article published by the *Wall Street Journal*, dated April 18, 2008, titled *Libor Surges After Scrutiny Does, Too*.

7. Attached as Exhibit F is a true and correct copy of an article published by the *Wall Street Journal*, dated April 17, 2008, titled *British Bankers Group Steps Up Review of Widely Used Libor*.

8. Attached as Exhibit G is a true and correct copy of an article published by *Factiva*, dated April 16, 2008, titled *BBA Libor Review Will Look for Past Misquoting from Banks*.

9. Attached as Exhibit H is a true and correct copy of a research report, dated April 10, 2008, titled *Special Topic: Is LIBOR Broken?*

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 13, 2015, at New York, New York.

/s/ Marc J. Gottridge
Marc J. Gottridge